

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re:

Mark A. Sprague,) Case No. 17-70212-JAD
Debtor) Chapter 13

JP Morgan Chase Bank, NA,)
Movant)
vs.) Docket No.
Mark A. Sprague)
Ronda J. Winnecur, Esq., Trustee,) Related to Claim 13
Respondent)

**DECLARATION THAT EXISTING CHAPTER 13 PLAN IS
SUFFICIENT TO FUND THE PLAN WITH MODIFIED DEBT**

AND NOW, comes the Debtor, Mark A. Sprague, by and through his counsel, Brian P. Cavanaugh, Esquire of Stewart, McArdle, Sorice, Whalen, Farrell, Finoli & Cavanaugh, LLC, and avers as follows:

1. On or about May 3, 2019, JP Morgan Chase Bank, NA filed a Notice of Mortgage Payment Change indicating that the new mortgage payment would be increased from \$616.19 to \$623.65.

2. The undersigned declares that he has reviewed the existing plan, recomputed the plan payment and finds that the existing payment is sufficient to fund the plan.

3. The undersigned further declares that the plan remains adequately funded to pay the new post petition monthly mortgage payment.

4. The effective date of the new payment is June 1, 2019 per the Notice filed on May 3, 2019.

I, Brian P. Cavanaugh, being eighteen (18) years of age or older, hereby certify under penalty of perjury that the information contained in this document is true and correct to the best of my knowledge, information and belief.

Respectfully submitted,

Date: 5/8/2019

By: /s/ Brian P. Cavanaugh

Brian P. Cavanaugh
Attorney for Debtor
PA ID #72691

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